

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 18-cv-04890.

MASTER DOCKET

18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The M2F Wellness LLC 401K Plan (“M2F Plan”) and Mitchell Protass (“Protass”) hereby stipulate and agree that SKAT’s action against Defendants M2F Plan and Protass, captioned *Skatteforvaltningen v. The M2F Wellness LLC 401K Plan, et al.*, No. 18-cv-04890, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York
December 4, 2023

By: /s/ Marc A. Weinstein
Marc A. Weinstein
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
marc.weinstein@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: /s/ Joseph LoPiccolo
Joseph LoPiccolo
POULOS LOPICCOLO PC
311 West 43rd St., 11th Fl., Ste. 124
New York, NY 10036
Telephone: (646) 931-0011
Fax: (732) 358-0180
lopiccolo@pllawfirm.com

*Counsel for The M2F Wellness LLC 401K Plan
and Mitchell Protass*

SO ORDERED:

Lewis A. Kaplan
United States District Judge